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| In re OSG SECURITIES LITIGATION | : | Master File No. 12 Civ. 7948 |
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| SOUTHERN DISTRICT OF NEW YORK | | |
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| UNITED STATES DISTRICT COURT | | |

LINITED STATES DISTRICT COURT

NOTICE OF THE INDIVIDUAL DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' CONSOLIDATED AMENDED COMPLAINT

PLEASE TAKE NOTICE, that upon the declaration of Scott B. Schreiber and the exhibits annexed thereto, the memorandum of law, and such other written and/or oral argument as may be presented to the Court, Defendants Morten Arntzen, Myles R. Itkin, G. Allen Andreas III, Alan R. Batkin, Thomas P. Coleman, Charles Fribourg, Stanley Komaroff, Solomon N. Merkin, Joel I. Picket, Ariel Recanati, Oudi Recanati, Thomas F. Robards, Jean-Paul Vettier, and Michael Zimmerman (collectively, the "Individual Defendants"), by and through their attorneys, will move this Court located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 15C, New York, New York 10007, on such date as the Court may set, pursuant to Rules 9(b) and 12(b)(6) of the Federal Rules of Civil Procedure, and the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4(b)(3)(A), to: (i) dismiss the claims in the Consolidated Amended Complaint ("Amended Complaint") asserted against all the Individual Defendants under Section 12(a)(2) of the Securities Act of 1933 (the "Securities Act"), 15 U.S.C. § 77l; (ii) dismiss the claims in the Amended Complaint asserted against Defendants Arntzen and Itkin under Section 11 of the Securities Act, 15 U.S.C. § 77k; (iii) dismiss the claims in the Amended Complaint asserted against

the claims in the Amended Complaint asserted against Defendants Arntzen and Itkin under Section 10(b) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. § 78j(b), and Rule 10b-5 promulgated thereunder, 17 C.F.R. § 240.10b-5; (v) dismiss the claims in the Amended Complaint asserted against Defendants Arntzen and Itkin under Section 20(a) of the Exchange Act, 15 U.S.C. § 78t(a); and (vi) grant such other relief as the Court may deem just and proper.

Dated: April 19, 2013 New York, NY

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed through the ECF system for electronic service to the registered participants, and paper copies will be sent to those indicated as non-registered participants (if any) on April 19, 2013.

/s/ Scott B. Schreiber